

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JOHN C. KITCHIN, JR., et al.,)
on behalf of themselves and all others)
similarly situated,)
)
Plaintiffs,)
) Case No. 4:18-cv-00672-CDP
vs.)
)
BRIDGETON LANDFILL, LLC, et al.,)
)
Defendants.)
)

DEFENDANTS' MOTION FOR SEALING

Defendant and Third-Party Plaintiff Bridgeton Landfill, LLC and Defendant Republic Services, Inc. (collectively “Defendants”) hereby move the Court to seal Defendants’ Motion to Disqualify James Clayborne and the Law Firm of Clayborne & Wagner LLP in Their Representation of Plaintiffs. The information discussed in Defendants’ Motion to Disqualify contains references to privileged attorney-client communications and attorney work product, and such communications and attorney work product are the very subject of the Motion to Disqualify. Therefore, the Motion to Disqualify should be sealed, and Defendants request that the Motion to Disqualify remains sealed indefinitely due to its privileged and confidential nature.

Dated: June 8, 2022

Respectfully submitted,

By: /s/ Allyson E. Cunningham
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 8, 2022 a true and correct copy of the foregoing was served on all counsel of record via electronic mail.

/s/ Allyson E. Cunningham
An attorney for Defendants and Third-Party Plaintiff